

Exhibit 2a

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**CERTIFIED
COPY**

-----X
NATASHA SEVERIN and GALINA
COTOVA, Individually and on
Behalf of All Others
Similarly Situated,

No. 10 CIV 9696 (DLC)

Plaintiffs,

- against -

PROJECT OHR, INC., METROPOLITAN
COUNCIL ON JEWISH POVERTY and
D'VORAH KOHN,

Defendants.
-----X

DEPOSITION OF NATASHA VITTORIA SEVERIN

New York, New York

Tuesday, September 20, 2011

Reported by:

ANNETTE ARLEQUIN, CCR, RPR

JOB NO. 41748

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3
4
5 September 20, 2011

6 10:04 a.m.
7

8 Deposition of NATASHA VITTORIA SEVERIN,
9 held at the offices of Mintz, Levin, Cohn,
10 Ferris, Glovsky and Popeo, P.C., 666 Third
11 Avenue, New York, New York, before Annette
12 Arlequin, a Certified Court Reporter, a
13 Registered Professional Reporter and a
14 Notary Public of the State of New York.
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1
2 A P P E A R A N C E S:

3
4 BERANBAUM MENKEN LLP

5 Attorneys for Plaintiffs

6 80 Pine Street, 33rd Floor

7 New York, New York 10005

8 BY: JENNIFER SMITH, ESQ.

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10
11 MINTZ LEVIN COHN FERRIS GLOVSKY and POPEO, P.C.

12 Attorneys for Defendants

13 Chrysler Center

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15 New York, New York 10017

16 BY: MICHAEL S. ARNOLD, ESQ.

17 Marnold@mintz.com

18 JENNIFER B. RUBIN, ESQ.

19 Jrubin@mintz.com

20
21 ALSO PRESENT:

22
23 GALYA KOROVINA, Russian Interpreter

1
2 IT IS HEREBY STIPULATED AND AGREED,
3 by and between the attorneys for the
4 respective parties herein, that filing
5 and sealing be and the same are hereby
6 waived

7 IT IS FURTHER STIPULATED AND AGREED
8 that all objections, except as to the form
9 of the question, shall be reserved to the
10 time of the trial.

11 IT IS FURTHER STIPULATED AND AGREED
12 that the within deposition may be sworn to
13 and signed before any officer authorized to
14 administer an oath, with the same force and
15 effect as if signed and sworn to before the
16 Court.

1 N. Severin

2 Let me rephrase that.

3 Are there any other documents in your
4 possession that relate to this lawsuit?

5 A. Those documents that I have at home
6 and which I have not handed over to anybody yet,
7 that's what you're asking about?

8 Q. Yes. Do any more documents exist
9 that you haven't given to your attorneys that
10 relate to your claims?

11 A. No.

12 Q. Ms. Severin, when did your employment
13 with Project OHR end?

14 A. I wrote an application to resign on
15 December 7, 2010.

16 Q. And after your employment ended with
17 Project OHR, did you work anywhere else as a
18 home attendant?

19 A. Yes.

20 Q. And where is that?

21 A. There were two private agencies;
22 Friendly Home Care and Caring Professional Inc.

23 Q. And when did you work for Friendly
24 Home Care?

25 A. I am still working there.

1 N. Severin

2 strictly the issue of procedure. I'm
3 explaining that if the lawyer objects, it
4 doesn't mean that she cannot answer. If
5 she cannot answer the lawyer will tell her
6 so.

7 MR. ARNOLD: Allow Jennifer to
8 dictate that because there are
9 times where --

10 MS. SMITH: I was going to say the
11 same thing. You can answer the question
12 even if I object unless I instruct you not
13 to answer.

14 MR. ARNOLD: I'll simplify it. I
15 apologize.

16 BY MR. ARNOLD:

17 Q. What knowledge, if any, does Galina
18 Cotova have that you regularly worked more than
19 40 hours per week?

20 MS. SMITH: Objection.

21 A. No.

22 Q. Do you know Irina, I'm not going to
23 attempt to say that last name but her first name
24 is Irina.

25 THE INTERPRETER: Shydouski.

1 N. Severin

2 A. I don't remember her.

3 Q. Do you know Lyubov Tsyganova?

4 A. I don't remember her.

5 Q. Do you know Irena Montes?

6 A. I don't remember.

7 Q. Ms. Severin, on what date did you
8 first start working for Project OHR?

9 A. In the end of January 2005.

10 Q. How did you hear about a job opening
11 at Project OHR?

12 A. At the time, every agency had
13 openings.

14 Q. And how did you hear about this
15 particular job opening?

16 A. I don't remember.

17 Q. What was your main job duty as a
18 Project OHR home attendant?

19 A. My duties were outlined in our care
20 plans.

21 Q. Now do these care plans provide
22 information on how to care for a Project OHR
23 client?

24 A. These plans outline what I was
25 supposed to do.

1 N. Severin

2 Q. Supposed to do for the Project OHR
3 client?

4 A. Yes.

5 Q. Did you attend an orientation when
6 you first started working at Project OHR?

7 A. Yes, of course.

8 Q. Do you remember what topics were
9 covered at this orientation?

10 A. It was very long ago. No.

11 MR. ARNOLD: I'll mark this as
12 Defendants' Exhibit No. 2.

13 (Defendants' Exhibit 2, Orientation
14 Checklist, Bates stamped D01289, marked for
15 identification, as of this date.)

16 MR. ARNOLD: It's a document Bates
17 stamped D01289.

18 BY MR. ARNOLD:

19 Q. Actually, Ms. Severin, before we go
20 forward, I forgot one instruction.

21 If you ever need to take a break at
22 any time, just let us know, okay?

23 A. Thank you.

24 Q. Ms. Severin, do you recognize this
25 document?

1 N. Severin

2 Q. I think you just said that your --
3 you said that your job description was discussed
4 partially.

5 Can you explain what you mean by
6 that?

7 A. We have many tasks and we did not
8 cover all of them.

9 Q. Do you remember asking any questions
10 about your job description at the orientation?

11 A. I don't remember.

12 Q. Ms. Severin, have you ever heard of a
13 sleep-in shift?

14 A. Yes, of course.

15 Q. Did you ever work a sleep-in shift
16 while employed at Project OHR?

17 A. Thirty-nine months.

18 Q. So is that a yes, you have worked a
19 sleep-in shift while employed at Project OHR?

20 A. Yes, thirty-nine months.

21 Q. Did you ever work another type of
22 shift while employed at Project OHR?

23 A. Of course, yes.

24 Q. What other type of shift did you
25 work?

1 N. Severin

2 A. Twelve-hour shifts, ten-hour shifts.

3 Q. Were those hourly shifts?

4 MS. SMITH: Objection.

5 A. I don't understand the question.

6 Q. When you worked the 10-hour or
7 12-hour shifts, were those shifts paid per hour?

8 A. Yes.

9 Q. Did you ever work a shift that was
10 less than 10 hours?

11 A. Yes.

12 Q. What was the fewest amount of hours
13 you would ever work in an hourly shift?

14 A. One hour 45 minutes.

15 Q. Other than the sleep-in shifts, just
16 focusing on the hourly shifts, would the hourly
17 shifts range from anywhere from 1 hour and 45
18 minutes to 12 hours?

19 A. Yes.

20 Q. Just a reminder to keep your answers
21 verbal because the reporter can't understand
22 nods.

23 THE INTERPRETER: What's the
24 question?

25 BY MR. ARNOLD:

1 N. Severin

2 Q. Okay. My question is, did the number
3 of hours you worked in shifts other than
4 sleep-in shifts vary?

5 A. Mostly it was 10 and 12 hours.

6 Q. Were there times that you worked
7 shifts less than 10 hours?

8 A. Seldom.

9 Q. Were there times that you worked the
10 shift less than nine hours?

11 A. Yes, if the agency required that.

12 Q. Did the start time of an hourly shift
13 vary from shift to shift?

14 A. Sometimes there would be a one hour
15 difference, whether it was started at 8 or at
16 9:00.

17 Q. Did you ever start an hourly shift at
18 1:00 in the afternoon?

19 A. Several times.

20 Q. When you worked an hourly shift, did
21 you ever -- withdrawn.

22 Have you ever heard of a duty-free
23 hour?

24 A. No, I know only the airport
25 duty-free.

1 N. Severin

2 Q. Good joke.

3 When you worked an hourly shift, did
4 you get an hour off for lunch?

5 A. Sometimes.

6 Q. Was there ever a week where you
7 worked just sleep-in shifts?

8 A. Such shifts lasted for months.

9 Q. My question is, was there ever a week
10 where you just worked sleep-in shifts and no
11 other shift?

12 A. You mean for this agency?

13 Q. I do.

14 A. Yes.

15 Q. Sticking with Project OHR, was there
16 ever a week where you only worked hourly shifts?

17 A. Yes.

18 Q. Was there ever a week where you
19 worked both an hourly shift and a sleep- in
20 shift?

21 A. It happened very seldom. Only in
22 cases of emergencies.

23 Q. Was there ever a week where you cared
24 for just one client?

25 A. Yes.

1 N. Severin

2 Q. Was there ever a week where you cared
3 for more than one client?

4 A. Very often.

5 Q. Was there ever a week where you cared
6 for more than one client on the same shift?

7 MS. SMITH: Objection.

8 A. There are so-called cluster cases
9 when it's husband and wife, and then sometimes
10 there were three clients.

11 Q. And you worked a shift like that
12 once?

13 A. [In English] Yes.

14 [Through the Interpreter] Several
15 times.

16 Q. How many clients would you say you
17 cared for over the course of your employment for
18 Project OHR?

19 A. I could not count.

20 Q. Do you think it was more than 50?

21 A. Much more than 50.

22 Q. Would you say it was more than 100?

23 A. Yes.

24 Q. Did another Project OHR home
25 attendant ever care for a client that you also

1 N. Severin

2 cared for?

3 A. Very often.

4 Q. Did you ever act as a client's
5 primary home care attendant?

6 MS. SMITH: Objection.

7 A. I don't know what is it.

8 Q. I guess I would rephrase it as did
9 you ever act as their main home care attendant?

10 MS. SMITH: Objection.

11 A. It didn't work like this.

12 Q. How did it work?

13 A. Sometimes they had two to three
14 persons within a week.

15 (Interpreter clarifying.)

16 A. Yes. One client would have more, two
17 or three home attendants a week.

18 Q. And did you ever work a shift as a
19 replacement home attendant?

20 THE INTERPRETER: A replacement?

21 MR. ARNOLD: Yes.

22 A. Often.

23 MR. ARNOLD: I want to mark this as
24 Defendants' Exhibit No. 3.

25 (Defendants' Exhibit 3, Document

1 N. Severin

2 entitled "Project OHR Standards HRA Tasks
3 Reference Guide," Bates stamped P442,
4 marked for identification, as of this
5 date.)

6 BY MR. ARNOLD:

7 Q. Ms. Severin, do you recognize this
8 document?

9 A. Of course.

10 Q. Did you provide it to your attorney?

11 A. I don't remember.

12 Q. This document is Bates stamped P442
13 to P443.

14 Ms. Severin, what is this document?

15 THE INTERPRETER: You want me to
16 translate it or did you say this document
17 is based?

18 MR. ARNOLD: You can translate it.

19 THE INTERPRETER: Oh, I see it.

20 Sorry.

21 (Interpreting.)

22 A. Yes.

23 Q. Ms. Severin, do you know what this
24 document is?

25 A. Yes, of course.

1 N. Severin

2 Q. And what is it?

3 A. This is a guide of our duties.

4 Q. And how, if at all, would you use
5 this document during your employment?

6 A. When we called every day, we called
7 in the end and then when we called, we named the
8 number of the tasks we performed and which tasks
9 we performed on a given day. Usually we did
10 much more, but they asked us to name only seven
11 tasks.

12 Q. Would these tasks indicate how long
13 you performed a task for?

14 Let me rephrase that.

15 Would these task codes indicate how
16 long you performed a task for?

17 A. No.

18 Q. Ms. Severin, what does the word
19 "daily" mean?

20 THE INTERPRETER: "Daily"?

21 MR. ARNOLD: Yes.

22 A. It means every day.

23 Q. What does the word "weekly" mean?

24 A. Every week.

25 Q. If I asked you to perform a task for

1 N. Severin

2 A. Yes. This is the Plan of Care.

3 Q. Were documents like this document
4 Bates stamped D02451, were they discussed during
5 the orientation?

6 A. I don't remember.

7 Q. Do you remember reviewing a sample
8 Plan of Care at your orientation?

9 A. I don't remember.

10 Q. What is the purpose of the Plan of
11 Care?

12 A. We need to know what the patient
13 needs and how we can help this patient.

14 Q. And did each client have their own
15 Plan of Care?

16 A. Yes.

17 Q. Does the information contained in
18 each client's Plan of Care differ depending on
19 the client's needs?

20 A. I don't understand the question.

21 Q. Would the information contained in
22 one client's Plan of Care differ from another
23 client's Plan of Care?

24 A. Well, the list of the tasks remains
25 the same, but each page has its own needs and

1 N. Severin

2 this was marked.

3 Q. When you worked for a client, would
4 you see their Plan of Care?

5 A. In those years, yes.

6 Q. Would you review the Plan of Care?

7 A. Well, immediately when we enter the
8 case, we review the Plan of Care.

9 Q. Were you required to follow the Plan
10 of Care when providing assistance to the client?

11 A. Yes. Yes, of course.

12 Q. Where would a Plan of Care be located
13 inside a client's home?

14 A. Well, they're not secret so they are
15 not kept away. They are attached to the
16 refrigerators.

17 Q. Did you ever discuss a client's Plan
18 of Care with anyone at Project OHR?

19 A. I would discuss separate tasks rather
20 than the plan as a whole.

21 Q. Who would you discuss these separate
22 tasks with at Project OHR?

23 A. If there were problems or
24 difficulties, I would discuss it with Miriam.

25 Q. Miriam. Okay.

1 N. Severin

2 Did you ever discuss with anyone at
3 Project OHR information contained on the Plan of
4 Care?

5 A. Miriam and the nurse.

6 Q. Other than attending the orientation,
7 did you ever attend any other training session
8 while employed at Project OHR?

9 A. They regularly hold in-service
10 sessions once every half a year.

11 Q. As part of your training were you
12 ever required to go to a client's home with
13 another Project OHR employee to learn how to
14 care for a client?

15 A. No, never.

16 MR. ARNOLD: Could we mark this as
17 Defendants' Exhibit No. 5. It's a document
18 Bates stamped D01265 to D01266.

19 (Defendants' Exhibit 5, Project OHR
20 document of three hour in-service training
21 session, Bates stamped D01265 through 266,
22 marked for identification, as of this
23 date.)

24 (Document review.)

25 BY MR. ARNOLD:

1 N. Severin

2 A. Nobody knows.

3 Q. For Question No. 11, the question is,
4 "The home attendant must clean the client's
5 entire home, including windows every day."

6 You answered false to that question;
7 is that correct?

8 A. Yes.

9 MR. ARNOLD: I'm going to mark this
10 as Defendants' Exhibit No. 6. It's a
11 document Bates stamped D01294.

12 (Defendants' Exhibit 6, Project OHR
13 Sleep-In Agreement, Bates stamped D01294,
14 marked for identification, as of this
15 date.)

16 BY MR. ARNOLD:

17 Q. Ms. Severin, do you recognize this
18 document?

19 A. Yes. It looks like my signature.

20 Q. Do you know what this document is?

21 A. Yes.

22 Q. And what is it?

23 A. So this document says that I agreed
24 to work as a sleep-in attendant for weekends for
25 a minimum of six months.

1 N. Severin

2 that you should partially assist somebody with
3 their medication, does that typically mean they
4 take medication?

5 A. Not always.

6 Q. And why wouldn't it be that?

7 A. Sometimes patient's children decide
8 on their own whether the patient should take
9 medication or not.

10 Q. Do you remember how big
11 Ms. [REDACTED] apartment was?

12 A. There were two rooms.

13 Q. Can you describe the two rooms?

14 A. Well, standard small bedrooms.

15 Q. Can you describe for me what is a
16 standard small bedroom in your view?

17 A. This is what Ms. [REDACTED] had.

18 Q. Can you describe what the small
19 standard bedroom looked like in Ms. [REDACTED]
20 apartment?

21 A. I could not -- I only think in
22 meters. I cannot easily convert it to American
23 system.

24 Well, I think there were two rooms,
25 15 square meters each.

1 N. Severin

2 A. But of course.

3 Q. Did the kitchen have a dining area?

4 A. I don't remember.

5 Q. Do you know if Ms. [REDACTED] received
6 care from other home attendants on days that you
7 were providing care for her?

8 A. Probably. I don't know.

9 Q. Did Ms. [REDACTED] have a pet?

10 A. I don't remember.

11 Q. If I referred you to Ms. [REDACTED]
12 Plan of Care, about a quarter of the way down it
13 says, "Pets" and next to that it says, "None."

14 Does that refresh your recollection
15 as to whether Ms. [REDACTED] had a pet?

16 A. Yes, of course.

17 Q. So do you remember -- so did
18 Ms. [REDACTED] have a pet?

19 A. No.

20 Q. Could Ms. [REDACTED] bathe herself?

21 A. No.

22 Q. How much assistance did you have to
23 provide for Ms. [REDACTED] to bathe herself?

24 A. From beginning to end and I had to
25 persuade her to bathe for a long time.

1 N. Severin

2 mats and napkins in order to avoid the
3 situation.

4 Q. Can you describe the process of
5 bathing -- let's not get into that. Strike
6 that.

7 Would you clean up the bathroom after
8 bathing Mrs. [REDACTED]?

9 A. Before and after.

10 Q. What would you do to clean the
11 bathroom before you bathed Ms. [REDACTED]?

12 A. I was making sure that the bathtub
13 was clean, that we had enough soap, shampoo and
14 towels, and that the floor was completely dry,
15 not a drop of water.

16 Q. And why did you want to make sure the
17 floor was completely dry?

18 A. Because it's exactly the place where
19 elderly persons often slip and fall.

20 Q. And you mentioned you would clean up
21 after the shower or the bathing as well.

22 What would you do to clean after?

23 A. Well, I cleaned up. I was making
24 sure that there are no parts of oily or soapy
25 residue.

1 N. Severin

2 And also I took off the floor all the
3 implements I put on the floor in order to avoid
4 her slipping on the wet floor and then I washed
5 them and dried them to clean, and hanged them to
6 dry.

7 Q. Great.

8 Again, going back to the time that
9 you cleaned before you had bathed her, how long
10 would that typically take you to clean?

11 A. Well, I did not take a stopwatch with
12 me because cleaning somebody's apartment is not
13 exactly a sporting event.

14 Q. And what about after the shower? How
15 long did it take you to clean up after you
16 bathed Ms. [REDACTED]?

17 A. Whatever it was necessary to make
18 sure that the bathroom was clean.

19 Q. Did you bathe other of your clients
20 during your employment at Project OHR?

21 A. Of course.

22 Q. Did the amount of time it took to
23 bathe a client depend on the type of assistance
24 they needed?

25 MS. SMITH: Objection.

1 N. Severin

2 A. Not only on that.

3 Q. What else would it depend on?

4 A. Well, it depended on the client's
5 wish. Some clients wanted to be bathed for a
6 longer time. Some clients just want to be in
7 the bathtub for 40 minutes, just be in water and
8 enjoy themselves. They love water.

9 Q. Did the amount of time you spent --
10 sorry. Strike that.

11 For your other clients besides
12 Ms. [REDACTED], did you also clean up the bathroom
13 before you bathed them?

14 A. I do it always, both for myself and
15 for them.

16 [In English] At home for myself, my
17 home.

18 [Through the Interpreter] Since I do
19 it for myself at home, I do it for them.

20 Q. How long would it typically take you
21 to clean before you bathed them?

22 A. It depends on how their bathroom was.

23 Q. And what about after the bath? Did
24 you clean up after the bath for your clients?

25 A. The same. I would clean until their

1 N. Severin

2 bathroom is clean and comfortable and safe.

3 Q. And how long would it typically take
4 you to do that for your clients?

5 A. Well, I had no time limit for that.

6 Q. Would the time you spent after the
7 bathing, cleaning for a client, be different
8 for -- strike that.

9 Would the time you spent cleaning the
10 bathroom after being with your client differ on
11 the condition of the client's bathroom?

12 A. Yes. It depended first on the state
13 of the bathroom and then on the amount of
14 cleaning supplies. Sometimes they offered very
15 little.

16 Q. Did the size of your client's
17 bathrooms differ?

18 A. Yes.

19 Q. Could Ms. [REDACTED] use her toilet by
20 herself?

21 A. It was necessary to help her.

22 Q. Typically how long would it take to
23 help her use the bathroom?

24 A. I don't remember.

25 Q. Would it typically last -- would it

1 N. Severin

2 typically take more than 10 minutes?

3 A. Yes.

4 Q. Would it typically take more than 20
5 minutes?

6 A. It could be.

7 Q. Do you remember how often
8 Ms. [REDACTED] used her toilet on a typical day?

9 A. Oh, many times. Often it just was a
10 false alarm. She thought that she needed --

11 Q. Did Ms. [REDACTED] ever unfortunately
12 soil herself?

13 A. I don't remember.

14 Q. Did any of your clients accidentally
15 get any bodily fluids on the floor of their
16 apartments?

17 A. Yes.

18 Q. And would you clean up the bodily
19 fluids off the floor after that happened?

20 A. Every time.

21 Q. Could Ms. [REDACTED] cook for herself?

22 A. No, absolutely not.

23 Q. Would you have to assist her -- then
24 you would have to assist her with cooking meals?

25 A. It was dangerous to allow

1 N. Severin

2 Ms. [REDACTED] near the kitchen because several
3 times she tried to switch on the gas and did not
4 understand actually why she was doing that,
5 particularly at night.

6 Q. Would you prepare Ms. [REDACTED]
7 meals?

8 A. Yes, when it was necessary.

9 Q. And how often was it necessary?

10 A. I don't remember.

11 Q. How long would it typically take to
12 prepare a meal for Ms. [REDACTED]

13 A. I don't remember her personal likes
14 and I don't remember what I cooked for her.

15 Q. Did you cook different meals for
16 different clients?

17 A. Yes, every time. Sometimes even
18 national cuisine.

19 Q. Did cooking a meal for a client ever
20 take you a long time?

21 A. Yes.

22 Q. What's the longest, if you remember,
23 that it ever took you to cook a meal for a
24 client?

25 A. About three hours.

1 N. Severin

2 Q. Would you clean up after -- what
3 would you do to clean up after cooking for a
4 client?

5 A. Well, a lot. First of all, it was
6 necessary to clean the stove, then to clean and
7 dry the dishes, clean the floor and everything
8 put beautifully in its place as it used to be
9 before cooking. Well, just make the kitchen
10 beautiful and clean.

11 Q. Did you ever cook more than one meal
12 for a client in one day?

13 A. Sometimes three meals.

14 Q. And after you would cook each of
15 those meals, would you clean the kitchen floor?

16 A. Of course. I always mopped it.

17 Q. Did some of your clients eat their
18 meals in their kitchens?

19 A. Seldom.

20 Q. And when they did, for the clients
21 that did, would you clean up after them, after
22 they ate their meals in their kitchen?

23 A. Of course.

24 Q. So I assume, then, some clients ate
25 their meals in other parts of their apartment;

1 N. Severin

2 is that correct?

3 A. Yes, it happened.

4 Q. Where else would a client eat their
5 meals in the apartment?

6 A. Well, the clients could eat them in
7 their beds.

8 Q. Using your example of a client who
9 eats in their bed, how would you clean up after
10 that client after they ate that meal?

11 A. Sometimes I had to change the bedding
12 and by all means to sweep the floor and to mop
13 the floor around the bed, and to make sure that
14 the floor is dry so that they would not slip and
15 fall. To dry the floor and then clean the
16 dishes.

17 Q. Would a client ever, staying with the
18 example of a client eating in bed, would a
19 client ever spill their drink on the floor?

20 THE INTERPRETER: "Urine"? You say
21 "urine"?

22 THE WITNESS: [In English] No.

23 MR. ARNOLD: Definitely didn't say
24 urine.

25 (Question was read back as follows:

1 N. Severin

2 "QUESTION: Would a client ever,
3 staying with the example of a client eating
4 in bed, would a client ever spill their
5 drink on the floor?")

6 MR. ARNOLD: Not even close.

7 A. Yes. My client [REDACTED], she was blind.
8 She always spilled everything on the floor.

9 Q. Is that [REDACTED]?

10 A. Yes.

11 Q. And if she would spill something on
12 the floor, would you clean it up?

13 A. Of course. Otherwise she was blind
14 and she would definitely slip and fall.

15 Q. Could Ms. [REDACTED] feed herself?

16 A. I don't remember.

17 Q. Would consulting or looking at her
18 Plan of Care remind you whether she --

19 A. Let me see.

20 (Document review.)

21 A. Yes, of course I helped her.

22 Q. Would you help any other of your
23 clients to feed themselves?

24 A. Very often.

25 Q. Could some of your clients feed

1 N. Severin

2 themselves without your help?

3 A. Yes, there were such clients.

4 Q. Could any of your clients use the
5 bathroom or use the toilet without your
6 assistance?

7 A. Yes.

8 Q. Could any of your clients bathe
9 themselves without your assistance?

10 A. No.

11 Q. Did the amount of time you spent
12 helping a client feed themselves differ
13 depending on the client?

14 A. Yes.

15 Q. Did the amount of time it took to
16 feed a client differ depending on the type of
17 meal that you were feeding them?

18 A. Of course.

19 Q. How long might it take to feed a
20 client who needed total assistance from you to
21 help feeding them?

22 A. Well, if you do it conscientiously,
23 then it could have taken an hour.

24 Q. Did you assist Ms. [REDACTED] in
25 grooming herself?

1 N. Severin

2 A. Of course.

3 Q. And what would you do to assist her?

4 A. Well, to dress her, she needed help
5 to get dressed. Well, everything is written
6 here.

7 Q. And what is it that is written here
8 that you think shows that she groomed herself.

9 A. Well, to move from one place to
10 another, to sit in a different place because she
11 was not steady on her feet. It was very
12 important to help her to walk because she was
13 prone to falling.

14 Q. Let's do one thing at a time. We're
15 focusing right now on grooming.

16 What would you do to help
17 Ms. [REDACTED] groom herself.

18 A. I remember I helped her to apply
19 moisturizers, I dressed her, walked with her.
20 Every step I had to watch.

21 Q. Would you help her with her dentures?

22 A. I remember, yes.

23 Q. How long would you say that it took
24 you to help her dress?

25 A. Well, you know, it's very difficult

1 N. Severin

2 for me to answer these questions because it was
3 so long ago and I'm afraid to give you the
4 information which is not exactly accurate.

5 Q. Would you help other clients dress?

6 A. Very often.

7 Q. Would the amount of time it took you
8 to dress, help dress a client differ depending
9 on the client?

10 A. Yes, on his or her illness.

11 Q. How long could it take you to dress a
12 client?

13 A. It was a different amount of time in
14 summer and in winter.

15 Q. How long might it take to dress a
16 client during the winter?

17 A. Well, if a client is half paralyzed
18 and the purpose was to take this client outside,
19 then it could have been any time from 45 minutes
20 up to an hour.

21 Q. Did you ever help a client dress
22 themselves more than once in the same shift?

23 A. Yes.

24 Q. Did you help other clients groom
25 themselves?